

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MARCELINO ANDRADE, BERENICE)
JACINTO, AMERICA GARCIA, ORALIA)
PALACIOS, MIGUEL RUBIO, ISMAEL)
ANDRADE, JOSE HERNANDEZ, LUCIA)
PORTILLO, RENE CORDOBA, and)
FRANCISCO MEDINA, on behalf of themselves) Case No. 08CV4912
and all other persons similarly situated, known and)
unknown,) Judge Manning
Plaintiffs,) Magistrate Judge Denlow
v.)
IDEAL STAFFING SOLUTIONS, INC., UAL,)
INC., ALITALIA AIRLINES, et al.,)
Defendants.)

**AGREED MOTION OF DEFENDANT UAL, INC.'S FOR AN EXTENSION
OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant, UAL, Inc., by its attorneys, presents its Agreed Motion for an Extension of Time To Answer or Otherwise Respond to the Complaint. In support of this Motion, Defendant UAL, Inc. states as follows:

1. On July 17, 2008, Plaintiffs filed a Complaint against Defendant UAL, Inc. and others in the Circuit Court of Cook County, Illinois, Chancery Division. On August 4, 2008 the registered agent of UAL, Inc. was served with the Summons and Complaint.
2. On August 27, 2008, Defendant UAL, Inc. timely removed the case to this Court.
3. Defendant UAL, Inc. has retained Morgan, Lewis & Bockius, LLP as counsel in this matter.
4. Counsel for Defendant UAL, Inc. requires additional time to investigate and evaluate Plaintiffs' Complaint, and to prepare an appropriate responsive pleading.

5. Accordingly, Defendant requests an additional sixty days, until and including November 3, 2008, to answer or otherwise plead in response to Plaintiffs' Complaint.

6. Counsel for Defendant UAL, Inc. has contacted counsel for Plaintiffs, and Plaintiffs have agreed to this sixty-day extension of time.

7. A sixty-day extension of time will not cause excessive delay in the litigation, nor will it unduly burden the parties.

WHEREFORE, Defendant UAL, Inc. respectfully request that the Court grant it a sixty-day extension of time, until and including November 3, 2008, to file its answer to Plaintiffs' Complaint or to otherwise respond to the Complaint.

Respectfully submitted,

Dated: August 29, 2008

By: _____
s/ Alison B. Willard
Sari M. Alamuddin
Alison B. Willard
Ticole T. Miller
Morgan, Lewis & Bockius LLP
77 W. Wacker Dr., Fifth Floor
Chicago, IL 60601

Counsel for Defendant UAL, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing *Agreed Motion Of Defendant UAL, Inc.'s For An Extension Of Time To Answer Or Otherwise Respond To Complaint* was electronically filed with the Court this 29th day of August, 2008, which will send a notice of electronic filing to the following counsel of record:

John E. Untereker
Christopher J. Williams
Working Hands Legal Clinic
77 W. Washington, Suite 1402
Chicago, Illinois 60602
Attorneys for Plaintiffs
juntereker@workers-law.org, aayala@workers-law.org

/s/Alison B. Willard

Alison B. Willard